

REMARKS

At the outset, Applicants wish to thank Examiner Lamb for the courtesies extended to Applicants' representatives during the August 10, 2004 interview at the United States Patent & Trademark Office. The substance of the interview is incorporated in the following remarks.

Summary of the Office Action

In the Office Action, claims 1, 7, and 13 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,055,061 to *Sato*.

Claims 2-6, 8-12, and 14-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Sato* in view of U.S. Patent No. 5,414,448 to *Wada*.

Summary of the Response to the Office Action

Applicants respectfully submit that the features of the present invention are not taught or suggested by the references of record. Accordingly, claims 1-16 are pending for further consideration.

All Claims are Allowable

Claims 1, 7, and 13 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Sato*. Applicants respectfully traverse these rejections for at least the following reasons.

Independent claim 1 recites a combination of features including "a code information storage part that stores code information for rendering; a font storage part that stores character shape data; and a management part that receives the code information and stores the information in the code information storage part." The Office Action alleges that *Sato*'s main body 100 is a code information storage part, that *Sato*'s font storage unit 209 is a font storage part, and that *Sato*'s printer control unit 1001 is a management part. Applicants respectfully disagree and

submit that *Sato* does not provide at least the above-mentioned features recited in claim 1.

Sato shows a host computer 201 that outputs printing information i.e., font data and control data to a printing apparatus 202. The printing apparatus comprises a communication controller 203, a format analyzer 204, an image memory 205, and printer engine 206. See Fig. 2 of *Sato*. The format analyzer 204 analyzes the printing information received from the host computer 201. The format analyzer 204 generates a print image and stores the image in the image memory 205. The image is then sent to the printer engine 206.

The format analyzer 204 includes a Sdot font selector 207, a Sdot font table 208, a font storage unit 209, and a Sdot position correction unit 210. The Sdot font selector 207 compares the font information sent from the host computer 201 against the Sdot font table 208. If the Sdot font is within certain limits, the Sdot font is retrieved from the font storage unit 209. Then a Sdot position correction unit 210 calculates a position offset of the Sdot font with the font information from the host computer 201, and delivers a corrected Sdot font to the format analyzer 204. See col. 3, line 22 through col. 4, line 31 of *Sato*.

Sato endeavors to improve the print processing of a printing apparatus by providing stored pre-rasterized fonts of a size close enough to a specified size such that the printer's processing time is reduced.

The Office Action alleges that the claimed "code information storage part" is the main body 100. Applicants respectfully submit that the main body 100 cannot anticipate the present invention because it is not "a code information storage part that stores code information" as recited in claim 1.

First of all, the main body 100 is not identified in any of *Sato*'s drawings. See Figs. 1-14 and col. 2, line 60 of *Sato*. The main body 100 does not appear to store any type of data at all and is not discussed in the specification. Applicants respectfully submit that the Office Action has incorrectly identified the main body 100 as a code information storage part. Therefore, *Sato* does not anticipate all the claimed features of the present invention because the main body 100 is not a code information storage part as alleged.

The Office Action also states that the claimed "font storage part" is the font storage unit 209. Applicants respectfully submit that the font storage unit 209 cannot anticipate the present invention because it does not store "reference information pointing to the code information (stored in the code information storage part)," as recited in claim 1. Parenthetical comments added. The font storage unit 209 provides character data, but it does not store reference information that points to stored data outside itself.

Further, if the font storage unit 209 were the alleged "font storage part," it would have to point to data stored in the main body (either item 1000 or 202). As demonstrated above, the main body does not store code information. It does not store any incoming character data from the outside host computer 201. Therefore, *Sato* does not anticipate all the claimed features of the present invention.

Finally, the printer control unit 1001 cannot be the management part as alleged in the Office Action. The "management part . . . retrieves the code information and stores the information in the code information storage part . . . and stores, in the code information storage part, reference information for referencing shape data of the character within the font storage part and stores, in the font storage part, the reference information pointing to the code information

referencing the character shape data,” as recited in claim 1. In contrast, the printer control unit 1001 “primarily converts character information to a video signal of the corresponding character pattern and outputs the video signal to a laser driver 1002” (col. 3, lines 3-6 of *Sato*), but does not store reference information. Thus, *Sato* does not anticipate claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 102(e) be withdrawn.

With respect to independent claim 7, Applicants respectfully submit that *Sato* does not anticipate all the features of claim 7. Specifically, the “management part that receives the code information and stores the data in the code information storage part, wherein the management part mutually connects pieces of code information indicating the same character, stored in the code information storage part, as a mutual reference list including the shape data of the character stored in the font storage part,” features recited in claim 7. As previously discussed, the printer control unit 1001 cannot be the management part as alleged in the Office Action because the printer control unit 1001 “converts character information to a video signal of the corresponding character pattern and outputs the video signal to a laser driver 1002” (col. 3, lines 3-6 of *Sato*), but does not store reference information. Thus, *Sato* also does not anticipate claim 7.

Accordingly, Applicants respectfully request that the rejection of claim 7 under 35 U.S.C. § 102(e) be withdrawn.

With respect to independent claim 13, Applicants respectfully submit that *Sato* does not anticipate all the features of claim 13. Specifically, an image processing method that stores “code information . . . in the code information storage part, . . . [and] . . . reference information for referencing the shape data of the character indicated by the code information” . . . [and also

stores] . . . shape data being stored in the font storage part; and . . . reference information pointing to the code information referencing the shape data of the character,” as recited in claim 13.

As previously discussed, *Sato* does not anticipate the claimed “code information storage part” at least because no feature in *Sato* stores code information and reference information in a code information storage part. Further, *Sato* does not store reference information in the font storage unit 209 as alleged in Office Action. Thus, *Sato* also does not anticipate claim 13. Accordingly, Applicants respectfully request that the rejection of claim 13 under 35 U.S.C. § 102(e) be withdrawn.

As pointed out in MPEP § 2131, a claim is anticipated by a prior art reference only if each and every element as set forth in the claim is found. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051 (Fed. Cir. 1987). Therefore, Applicants respectfully assert that the rejections under 35 U.S.C. § 102(e) should be withdrawn because *Sato* does not teach or suggest each feature of independent claims 1, 7, and 13.

All Subject Matter Complies With 35 U.S.C. § 103(a)

Claims 2-6, 8-12, and 14-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Sato* in view of *Wada*. Applicant respectfully submits that the Office Action has not established a *prima facie* case of obviousness and therefore all rejections under 35 U.S.C. § 103(a) should be withdrawn.

To establish a *prima facie* case of obviousness, three basic criteria must be met (see MPEP §§ 2142-2143). First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill the art, to

combine reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art references must teach or suggest all the claim limitations. All three criteria must be met to establish obviousness.

Wada relates to an information processing system wherein data expressing a character, a pattern or the like in a dot form (bitmap) is generated from outline information expressing the outline of that character, the pattern or the like in a vector form, and wherein the bitmap is printed out by an output engine such as a laser printer or thermal transfer printer. See col. 1, lines 6-16 of *Wada*. However, *Wada* does not make up for the above-mentioned deficiencies of *Sato*.

The Office Action relies upon the teachings of *Wada* to allegedly cure certain deficiencies of *Sato* so as to teach the claimed invention as a whole. *Wada*, however, fails to cure the deficiencies identified in *Sato* above. *Wada* shows a character generator, but does not teach or suggest at least a “code information storage part” as recited in claims 2-6, 8-12, and 14-16. Thus, neither *Sato* nor *Wada* teaches or suggests at least this feature of the present invention. Accordingly, the combination proposed by the Office Action fails to teach or suggest features of the claimed invention as a whole as recited in claims 2-6, 8-12, and 14-16.

In the Office Action dated December 19, 2003, the Examiner concedes that *Wada* fails to disclose numerous features in the claims. We agree and further argue that because neither *Sato* nor *Wada* teaches or suggests all of the features in claims as recited in claims 2-6, 8-12, and 14-16, the claims are patentable.

In view of the above arguments, Applicants respectfully request that the rejection of claims 2-6, 8-12, and 14-16 under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

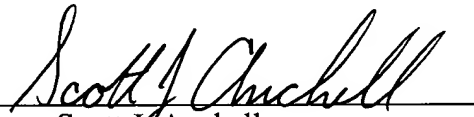
In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Entry of this amendment is respectfully submitted to the proper insofar as no new issues are raised, no new matter is presented, and no new claims have been added. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. §1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: _____



Scott J. Anchell

Reg. No. 35,035

Date: August 13, 2004

Customer No. 009629

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, NW

Washington, D.C. 20004

Tel.: (202) 739-3000

SJA/DEC